

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

ESHA RESEARCH, INC., etc.

Plaintiff(s),

v.

CRONOMETER SOFTWARE, INC., etc., et al.

Defendant(s).

Case No.: 3:24-cv-01586-AB

MOTION FOR LEAVE TO APPEAR  
*PRO HAC VICE*

Attorney Cary D. Sullivan requests special admission *pro hac vice* to the Bar of the United States District Court for the District of Oregon in the above-captioned case for the purposes of representing the following party (or parties):

Plaintiff ESHA RESEARCH, INC., now known as TRUSTWELL

In support of this application, I certify that: 1) I am an active member in good standing with the California State Bar; and 2) that I have read and am familiar with the Federal Rules of Evidence, the Federal Rules of Civil and Criminal Procedure, the Local Rules of this Court, and this Court's Statement of Professionalism.

I understand that my admission to the Bar of the United States District Court for the District of Oregon is solely for the purpose of litigating in the above matter and will be terminated upon the conclusion of the matter.

**(1) PERSONAL DATA:**

Name: Sullivan Cary D.  
(Last Name) (First Name) (MI) (Suffix)

Agency/firm affiliation: Jones Day

Mailing address: 3161 Michelson Drive, Suite 800

City: Irvine State: CA Zip: 92612

Phone number: (949) 851-3939 Fax number: (949) 553-7539

Business e-mail address: carysullivan@jonesday.com

**(2) BAR ADMISSION INFORMATION:**

(a) State bar admission(s), date(s) of admission, and bar number(s):  
California; 12/2003; 228527

(b) Other federal court admission(s) and date(s) of admission:  
USDC - Central; 12/23/2003; USDC - Northern; 03/31/2004; USDC - Eastern;  
01/08/2004; US Ct. of Appeal, 9th Cir.; 01/12/2004

**(3) CERTIFICATION OF DISCIPLINARY ACTIONS:**

☒ I am not now, nor have I ever been, subject to any disciplinary action by any state or federal bar association or subject to judicial sanctions.

☐ I am now or have been subject to disciplinary action by a state or federal bar association or subject to judicial sanctions. (Attach letter of explanation.)

**(4) CERTIFICATION OF PROFESSIONAL LIABILITY INSURANCE:**


Pursuant to LR 83-3, I have professional liability insurance, or financial responsibility equivalent to liability insurance, that meets the insurance requirements of the Oregon State Bar for attorneys practicing in this District, and that will apply and remain in force for the duration of the case, including any appeal proceedings.

**(5) CM/ECF REGISTRATION:**

I acknowledge that I will become a registered user of the Court's case management and electronic case filing system (CM/ECF) upon approval of this application, and I consent to electronic service pursuant to Fed. R. Civ. P. 5(b)(2)(E) and the Local Rules of the District of Oregon.

**Certification of Attorney Seeking *Pro Hac Vice* Admission:** I have read and understand the requirements of LR 83-3, and I certify that the above information is true and correct.

DATED: 01/03/2025

  
(Signature)

**REQUIREMENT TO ASSOCIATE WITH LOCAL COUNSEL:**

LR 83-3(a)(1) requires applicants for *pro hac vice* admission to associate with local counsel, unless requesting a waiver of the requirement under LR 45-1.

To request a waiver of the requirement to associate with local counsel under LR 45-1, check the following box:

- ☐ I seek admission for the limited purpose of filing a motion related to a subpoena that this Court did not issue. Pursuant to LR 45-1(b), I request a waiver of the LR 83-3(a)(1) requirement to associate with local counsel and therefore do not include a certification from local counsel with this application.

To associate with local counsel, provide the following information about local counsel, and obtain the signature of local counsel.

Name: Talcott Brian R.  
(Last Name) (First Name) (MI) (Suffix)

OSB number: 965371

Agency/firm affiliation: Dunn Carney LLP

Mailing address: 851 SW Sixth Avenue, Suite 1500

City: Portland State: OR Zip: 92704

Phone number: (503) 224-6440 Fax number: (503) 224-7324

Business e-mail address: btalcott@dunncarney.com

**CERTIFICATION OF ASSOCIATE LOCAL COUNSEL:**

I certify that I am a member in good standing of the bar of this Court, that I have read and understand the requirements of LR 83-3, and that I will serve as designated local counsel in case number 3:24-cv-01586-AB.

DATED: 01/03/2025.

/s/ Brian R. Talcott  
(Signature of Local Counsel)